

## **SEALED**

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#### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNDER SEAL

### BILL OF INFORMATION FOR CONSPIRACY TO SOLICIT AND GIVE BRIBES INVOLVING A PUBLIC OFFICIAL

UNITED STATES OF AMERICA

CRIMINAL DOCKET NO.

v.

WILLIAM J. HUBBARD a/k/a Bill Hubbard

**VIOLATION: 18 U.S.C. § 371** 

18 U.S.C. § 666

SECT. A MAG. 5

The U. S. Attorney charges that:

#### COUNT 1

#### AT ALL TIMES MATERIAL HEREIN: A.

- On or about January 14, 2008, the defendant, WILLIAM J. HUBBARD, (a/k/a Bill 1. Hubbard), was elected as the President of St. John the Baptist Parish (St. John Parish) for the State of Louisiana.
- As the President of St. John Parish, WILLIAM J. HUBBARD, was in a position to 2. recommend and sign off on the contracts that the Parish Council awards to various vendors who sought to conduct business with St. John Parish.

3.	St. John Parish has received federal assistance and grants in	56a \\\\\\\\
the past year	to the date of this Bill of Information.	Process A Wick
		CtRmDep Doc. No

#### B. THE CONSPIRACY:

Beginning at a time unknown, but prior to on or about May 5, 2009, and continuing until on or about May 27, 2009, and later, in the Eastern District of Louisiana and elsewhere, the defendant, WILLIAM J. HUBBARD, and others known and unknown to the U. S. Attorney, did knowingly and willfully combine, conspire and agree with each other to knowingly and corruptly solicit, demand, accept and agree to obtain something of value from various vendors with the intent to be influenced and rewarded in connection with the awarding and obtaining business from St. John Parish, a government entity of the State of Louisiana, involving something of value of \$5,000 or more; all in violation of Title 18, United States Code, Section 666(a)(1)(B).

#### C. OVERT ACTS:

On or about the following dates in furtherance of this conspiracy and to accomplish its purpose, the defendant, **WILLIAM J. HUBBARD**, and others known and unknown to the U. S. Attorney, committed the following overt acts in the Eastern District of Louisiana and elsewhere;

- 1. On or about May 5, 2009, the defendant, WILLIAM J. HUBBARD, in his capacity as President of St. John Parish, State of Louisiana, solicited a \$5,000.00 check, for the personal benefit of the defendant, payable to a local automobile dealership, from Vendor A, who obtained work from and was conducting business with St. John Parish.
- 2. On or about May 27, 2009, **WILLIAM J. HUBBARD**, in his capacity as President of St. John Parish, State of Louisiana, signed off on a \$29.5 million dollar bond issue which contained a contract that was awarded to Vendor A by the St. John Parish Council for a professional services contract worth approximately \$1 million dollars.

- 3. On or about May 5, 2009, the defendant, WILLIAM J. HUBBARD, in his capacity as President of St. John Parish, State of Louisiana, solicited a \$5,000.00 check, for the personal benefit of the defendant, payable to a local automobile dealership, from Vendor B, who obtained work from and was conducting business with St. John Parish.
- 4. On or about May 26, 2009, the defendant, WILLIAM J. HUBBARD, in his capacity as President of St. John Parish, State of Louisiana, solicited a \$10,000.00 check, for the personal benefit of the defendant, payable to a local automobile dealership, from Vendor C, who obtained work from and was conducting business with St. John Parish.
- 5. On or about May 5, 2009, and on or about May 26, 2009, WILLIAM J. HUBBARD delivered three checks totaling \$20,000.00 to a local automobile dealership as a down payment on a new car that HUBBARD obtained from Vendors A. B and C.

All in violation of Title 18, United States Code, Section 371.

CLERK'S OFFICE
A TRUE COPY

AUG 27 2009

Deputy Cierk, U. S. District Court
Eastern District of Louislans
New Orleans, LA

JIM LETTEN/(85/7)/ UNITED STATES ATTORNEY

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BRIAN M. KLEBBA

Assistant United States Attorney

New Orleans, Louisiana August 25, 2009